



7621 13th Avenue, Brooklyn NY 11228

718.305.1702 Office

718.395.1732 Fax

J.Iandolo@jiandololaw.com

February 10, 2022

VIA ECF

Honorable Marcia M. Henry
225 Cadman Plaza E.
Brooklyn New York, 11201

Re: *Suliaman v. Motashem R. Khalil et al.*
Case No. 20cv6032

Dear Judge Henry:

Pursuant to the courts order dated November 03, 2021, the parties have met and conferred, via telephone, regarding all discovery matters, and the mis-calendaring of the deadline to file this letter by both parties, for which we apologize. In short, Defendant has acknowledged that Plaintiff has responded to Defendants demands, dated October 14, 2021, on November 22, 2022. Additionally, Plaintiff served demands on September 9, 2021, with a Request for Production as well as a Demand for Interrogatories, of which have likewise been responded to as of this date.

In addition to the aforementioned discovery, the parties have agreed that the parties shall conduct depositions of Defendant Khalil on or before March 29, 2022, and of Plaintiff, Amer Suliaman on April 5, 2022.

Lastly, the parties hereto have yet to enter into meaningful settlement discussions as there is a dispositive motion still pending, regarding Defendant Khalil (*ECF* Dkt. No. 14). Additionally, there are two pending default judgment motions, against the other two defendants.

Sincerely,

Jeremy M. Iandolo

Jeremy M. Iandolo, Esq.